

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

DJONIBEK RAHMANKULOV,

Defendant.

Declaration of Joseph Z. Amsel,  
Esq. in Support of Motion to  
Withdraw as Co-Counsel

Case No. 1:20-cr-00653-RA

JOSEPH Z. AMSEL, an attorney admitted to practice law before this Court hereby affirms under penalty of perjury that the following statements are true, except for those made upon information and belief, which I believe to be true:

1. I am the principle of the Law Offices of Joseph Z. Amsel, PLLC, co-counsel of record for the defendant, DJONIBEK RAHMANKULOV. I am familiar with the facts of this case and make this affirmation in support of my motion to be relieved as co-counsel of record for the following reasons:

2. In or about February 2021, Mr. Joseph W. Murray, Esq., counsel of record for Mr. Rahmankulov, requested that I assist him in representing Mr. Rahmankulov in this case. Although we operate separate law firms, Mr. Murray and I have been co-counsel on other cases and have worked well together. Given the allegations in this case, this case likely contained voluminous discovery and complex legal and factual issues. Therefore, having two attorneys would be beneficial for Mr. Rahmankulov's defense.

3. Accordingly, on February 15, 2021, I filed a notice of appearance in this case as co-counsel to Mr. Murray.

4. For the reasons set forth by Mr. Murray on the record during a pre-trial conference on June 2, 2022 related to Defendant's inability to pay for two lawyers to try this case, I am hereby moving this Court to withdraw as co-counsel of record.

5. As Mr. Murray represented to this Court on June 2, 2022, he stands ready, willing and able to continue his representation of Mr. Rahmankulov and my withdrawal from the case will not prejudice the defense of Mr. Rahmankulov or delay the trial of this matter in any way.

6. Accordingly, I respectfully urge this Court to grant my motion to withdraw as counsel of record for Mr. Rahmankulov.

7. Mr. Rahmankulov has been informed my intention to withdraw from this matter and has consented to this withdrawal.

**Wherefore**, I respectfully urge the Court to grant my motion to withdraw as co-counsel of record for Defendant DJONIBEK RAHMANKULOV.

Dated: July 3, 2022

Yours, etc.

/s/ JOSEPH Z. AMSEL  
*Co-Counsel for the Defendant*  
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*To All Appearing Counsel Via ECF*